

PARONICH LAW, P.C.

350 Lincoln Street, Suite 2400
Hingham, MA 02043

Anthony I. Paronich

Tel. (508) 221-1510
Fax (508) 318-8100
anthony@paronichlaw.com

July 20, 2023

VIA ECF

Honorable James M. Wicks
United States District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Naiman v. Big Think Capital Inc.
Civil Action No. 2:22-cv-2531

Dear Judge Wicks:

The Plaintiff and Defendant have begun to engage in discovery. The Defendant's deposition occurred this week and the Plaintiff's deposition is occurring on July 20, 2023. Following the Defendant's deposition, the Plaintiff has served a second set of discovery and initiated a meet and confer regarding a supplemental production. However, the Defendant continues to attempt to obtain its information from the third party vendor that has some relevant class data. As such, the parties have conferred and are jointly proposing the following tentative dates for the completion of case events:

Discovery	September 28, 2023
Expert Reports	October 27, 2023
Mediation Deadline	November 10, 2023
Class Certification filing deadline	November 24, 2023
Summary Judgment filing deadline	December 1, 2023
Status Conference post MSJ and Class Certification	30 days after the Court's Decision

The parties are also jointly requesting that this Friday's status conference be continued to a later date so that they may continue to make progress in discovery.

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Thank you to the Court for its consideration of our submission and please feel free to contact us if there are any questions.

Respectfully Submitted,

/s/ Anthony I. Paronich

Anthony I. Paronich

cc: All Counsel of Record (Via ECF)